

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

PIERCE COUNTY REPUBLICAN PARTY, an  
unincorporated association,

Plaintiff,

v.

ERIC CROWL, an individual,

PIERCE COUNTY REPUBLICAN PARTY, a  
nonprofit corporation,

& WASHINGTON 47 PAC, a nonprofit  
corporation.

Defendants.

No.

COMPLAINT FOR VIOLATION  
OF SECTION 43(a) OF THE  
LANHAM ACT, 15 U.S.C. § 1125(a)

COMES NOW the Plaintiff, Pierce County Republican Party, by and through their  
counsel of record Conner Edwards, and respectfully submits this Complaint, as follows:

**PARTIES**

**1.1** Plaintiff Pierce County Republican (hereafter “PCRP”) is an unincorporated,  
bona-fide county political party within the meaning of RCW 42.17A.005(6)(c) that is

1 headquartered at 10209 Bridgeport Way SW, #C1 Lakewood, WA 98499. The PCRCP has  
2 operated continuously since at least 1964 and is well known in Pierce County, Washington.  
3 Primary PCRCP activities includes: voter outreach, candidate recruitment, holding caucuses,  
4 fundraising, volunteer coordination, get-out-the-vote efforts, platform development and  
5 community engagement.

6 **1.2** Defendant Eric Crowl is an individual that lives at 10002 112th St SW,  
7 Lakewood, WA 98498.

8 **1.3** Defendant Pierce County Republican Party (hereafter “Crowl PCRCP Corp.”) is  
9 a Washington nonprofit corporation that was registered by Defendant Eric Crowl on March  
10 4, 2025. The address for this organization is listed as 10002 112th St SW, Lakewood, WA  
11 98498. The registered agent for this organization is listed as “Washington47 PAC”.

12 **1.4** Defendant Washington47 PAC is a Washington nonprofit corporation that was  
13 registered by Defendant Eric Crowl on January 6, 2025. The address for this organization is  
14 listed as 10002 112th St SW, Lakewood, WA 98498. The registered agent for this organization  
15 is listed as Eric Crowl.

16 **1.5** On information and belief, Defendant Crowl has personally authorized,  
17 directed and/or endorsed the unlawful conduct alleged in this Complaint.

## 18 **2 JURISDICTION AND VENUE**

19 **2.1** This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331, 28  
20 U.S.C. § 1338 (a)-(b), and Section 39 of the Federal Trademark Act of 1946, as amended (the  
21 “Lanham Act”), 15 U.S.C. § 1121.

22 **2.2** Venue is proper in this Court under 28 U.S.C. § 1391 (b)(1) and (b)(2).

**3 FACTUAL ALLEGATIONS**

**3.1** In November of 2024, the Executive Board of Plaintiff Pierce County Republican Party (hereafter “PCRP”) voted unanimously to deny Defendant Eric Crawl entry to the biennial organizational meeting.

**3.2** This action was subsequently ratified by a vote of the PCRP’s full membership at the biennial organizational meeting in December of 2024.

**3.3** While in the process of threatening litigation against the PCRP for being denied entry to the biennial organizational meeting, Defendant Crawl discovered that the PCRP is not incorporated with the Washington Secretary of State’s Office.

**3.4** Following this revelation, Defendant Crawl registered the name “Pierce County Republican Party” as a Washington nonprofit corporation, listing Defendant Crawl’s other Washington nonprofit corporation (Washington 47 PAC) as the incorporator.

**3.5** Following this, Defendant Crawl rushed to social media, announced the organization’s registration, created a Facebook page with the name “Pierce County Republican Party”, and proclaimed himself the new party chair.

**3.6** Defendant Crawl has also hosted several X Spaces where the title of the Space was “Pierce County Republican Party – Press Availability”. X Spaces are live audio rooms on the X (formerly Twitter) platform where users can host and join conversations, allowing for real-time audio discussions on various topics.

**3.7** In response to Defendant Crawl’s actions, Plaintiff PCRP sent Defendant Crawl a letter on March 8, 2025 demanding that Defendant Crawl amend the name of his “Pierce County Republican Party” nonprofit corporation, take down his fraudulent “Pierce

County Republican Party” Facebook page, and cease any future similar activities no later than March 21, 2025.

3.8 As of the time of filing this complaint, the “Pierce County Republican Party” nonprofit corporation’s name has not been amended.

3.9 The fraudulent “Pierce County Republican Party” Facebook page was eventually taken down; however, it is unclear whether it was taken down by Defendant Crowl or by Facebook administrators.

#### 4 Claim for Relief

4.1 Plaintiff PCRP incorporates everything set forth above and below as though fully set forth herein.

4.2 Defendants’ acts have caused or are likely to cause confusion, mistake or deception as to the services provided by Plaintiff.

4.3 Defendants’ acts have injured or are likely to injure Plaintiff’s image and reputation with voters in Pierce County by creating confusions about, and dissatisfaction with, Plaintiff’s services and activities.

4.4 On information and belief, the actions undertaken by the Defendants as described above constitute a knowing, deliberate, intentional, and willful attempt to injure Plaintiff, to trade on Plaintiff’s reputation, to confuse or deceive voters, and to interfere with the Plaintiff’s relationships with political actors in Pierce County and beyond.

4.5 Defendants’ actions constitute a violation of Section 43(a) of the Lanham Act, 15 U.S.C. 1125(a).

**4.6** Defendants' acts irreparably damage Plaintiff and will continue to damage Plaintiff unless restrained by this Court; wherefore, Plaintiff is without an adequate remedy at law. Accordingly, Plaintiff is entitled to, among other things, an order enjoining and restraining Defendants from using the "Pierce County Republican Party" name.

## 5 Prayer for Relief

WHEREFORE, Plaintiff respectfully prays that this Court:

**5.1** Enjoin and restrain Defendants during the pendency of this action, and permanently thereafter, from using the Pierce County Republican Party name/mark;

**5.2** Issue an order declaring that Defendants’ acts constitute a violation of Section 43(a) of the Federal Trademark Act of 1946, as amended (the “Lanham Act”), 15 U.S.C. § 1125(a);

**5.3** Issue an order requiring Defendants, jointly and severally, to:

a. pay over to Plaintiff all damages incurred by Plaintiff by reason of Defendants' trademark infringement pursuant to 15 U.S.C. § 1117(a), and treble the damages in accordance with 15 U.S.C. § 1117(a);

b. pay to Plaintiff the costs of this action, together with reasonable attorneys' fees and disbursements, in accordance with 15 U.S.C. § 1117(a);

c. contact the Washington Secretary of State to amend Defendants' corporate registration to something not confusingly similar to the Pierce County Republican Party name.

1 d. provide to Plaintiff all tangible and intangible property in Defendants'  
2 possession that bears the Pierce County Republican Party name or mark.

3 e. file with this Court and serve on Plaintiff an affidavit setting forth in detail the  
4 manner and from in which Defendants have complied with the terms of the injunction, in  
5 accordance with 15 U.S.C. § 1116.

6 **5.3** Granting such other and further relief as the Court deems just and equitable.  
7

Dated: March 23, 2025

Respectfully submitted,



s/ Conner Edwards

Conner Edwards

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